

Application Serial Number: 09/725,792  
Amendment/Response dated October 11, 2005

Attorney Docket No.: 3063-38

## REMARKS

### Claim Objections

Claims 19 through 27 are pending in the above-identified application. By this Amendment, the Applicant has amended dependent claims 24, 25, and 26 to properly indicate dependence to claim 23. The amendments to the claims are supported by the application as originally filed, and do not introduce new matter. Accordingly, entry of the amendments is respectfully requested.

### Claim Rejections – 35 U.S.C. §102

At page 2 of the Office Action, the Examiner rejects claims 19 through 27 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,035,304 (“Machida”). The Applicant respectfully traverses these rejections, and asserts that the claims pending in the present application are patentable over Machida for at least the reasons stated below.

Machida discusses systems and methods for storing and playing a multimedia application with a variety of services added to the main application. Col. 1, lines 43-48. According to Machida, an application comprises a main service and additional services. Col. 5, lines 25-32. An example of a main service is a channel of a TV broadcast, while an additional service may be pictures, text, etc. Col. 5, lines 25-32. Service adding information (“SAI”) is included with an application to provide the necessary information and methods to display additional services. Col. 5, lines 40-49. SAIs are broadcast and stored prior to the broadcast of applications and have associated IDs which correspond to the respective application. Col. 6, lines 20-23. Included with the broadcast of application data are trigger codes. Col. 22, lines 19-22. When the system receives a trigger, the SAI is used to process and insert the desired additional service. Col. 17, lines 6-14.

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In contrast to Machida, independent claim 19 is directed to a method for synchronizing and propagating changes to an event. Events are registered in a first table, with each event assigned an event identifier. Additionally, event triggers corresponding to the registered events are stored in said first table. Interests are registered in a second table that stores procedures to execute for a given trigger. Upon a change in an event, an event trigger is generated. When a trigger is generated, the first table is inspected for the event trigger. Upon finding the trigger, the second table is inspected for the procedure(s) to execute for the event trigger for the event identifier. The procedure(s) found are then executed. Independent claims 23 and 27 comprise substantially similar elements, cast as a system and computer readable media, respectively, for executing the method of independent claim 19.

The Examiner asserts that Machida discusses registering an event in a first table wherein said first table stores the event identifier and an event trigger, and where events are attributes of an SAI and are assigned an event identifier ("ID"). However, Machida does not discuss a system for storing both an event identifier and an event trigger. Col. 17, lines 16-20. Events, as discussed in Machida, are at best only one attribute of an SAI. Col. 17, line 16-17. Each event attribute contains an event ID and information on the action to be taken upon receipt of an event trigger code. Col. 17, lines 16-25. According to the system of Machida, triggers are broadcast from a broadcast station and are incorporated into the application data using trigger codes. Col. 22, lines 19-24. Machida then monitors event triggers that are broadcast with an application. Col. 22, lines 36-40. When an event trigger code is received that corresponds to an event ID, Machida merely executes the action corresponding to the event ID received. Col. 17, lines 16 - 25, and Col. 17, lines 47-43, and Col. 17, lines 64-67. Machida, however, does not use an event ID to synchronize and propagate changes to a registered event. Moreover, Machida does not store event identifiers

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and event triggers in a first table as claimed. Instead, Machida uses trigger codes (that correspond to an event ID) that are broadcast and are used to invoke a corresponding action.

The Examiner further asserts that Machida discusses registering interests in a second table wherein the second table stores a procedure to execute for said event trigger. Machida does not discuss, teach or otherwise suggest the use of interests registered in a second table. The Examiner makes reference to the "METHOD" attribute of an SAI. The METHOD attribute of an SAI, however, is merely an index of the methods used by an application. Col. 10, lines 25-26. As discussed in Machida, a method is comprised of data and a program for utilizing the data. Col. 19, lines 27-29. The program element of a method is executed when a user of the system makes a certain request or gives a specified instruction. Col. 19, lines 27-31. However, neither the METHOD attribute nor any distinct methods within the method index are related to an event trigger as claimed. A method is directly invoked upon receipt of a user instruction, and thus is not executed based upon an event trigger. Conversely, independent claim 19 is directed towards registering interests in a second table, wherein the second table stores a procedure to execute for an event trigger, where an event trigger is stored in a first table. When an event is changed, an event trigger is generated. A first table is inspected for the event trigger generated. A second table is then inspected for the procedure(s) to execute upon the event trigger for a given event identifier.

The Examiner also asserts that Machida discusses changing an event wherein the change generates an event trigger, inspecting a first table for the event trigger for the event and a second table for the procedure to execute upon the event trigger event for the event identifier. The Applicant respectfully disagrees with the Examiner's assertion. If a user of the system in Machida makes a certain request or provides a certain instruction, a method is directly activated. Col. 22, line 50-56. Machida does not disclose a system where

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the changing of an event generates an event trigger. Instead, as noted previously, trigger codes are included with the application data such that input from a user merely invokes a method identified by an SAI. Col. 22, lines 19-22, 50-56, and 59-64. Moreover, the system in Machida does not inspect a first table for an event trigger for a specified event, nor does the system in Machida inspect a second table for a procedure to be executed upon occurrence of the event trigger event for the specified event identifier. Input from a user of Machida, however, does not cause an event trigger to be generated as claimed.

Consequently, Machida fails to teach or otherwise suggest the elements of independent claim 19. Similarly, independent claim 23 is directed towards a system and independent claim 27 is directed towards a computer program that corresponds to the method of claim 19 for synchronizing and propagating changes to an event. Similar to independent claim 19, independent claims 23 and 27 comprise a number of elements that are absent from Machida and are therefore allowable for at least the same reasons presented in connection therewith. As Machida fails to teach or suggest elements of independent claims 19, 23 and 27, Applicants respectfully request withdrawal of the rejection and allowance of the same.

The dependent claims of the present application contain additional features that further substantially distinguish the invention of the present application over the prior art of record. Given the Applicant's position on the patentability of the independent claims, however, it is not deemed necessary at this point to delineate such distinctions.

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For the above reasons, Applicant submits that the present invention, as claimed, is patentable over the references cited by the Examiner. Accordingly, reconsideration and allowance of pending claims 19-27 is therefore respectfully solicited. To expedite prosecution, the Examiner is invited to contact the Applicant's representative at 212-895-2000.

Respectfully submitted,

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